

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MANNY CHONG, THANE GALLO,  
and ALL OTHERS SIMILARLY  
SITUATED, ) Case No. 1:20-cv-10844-RGS  
Plaintiffs, )  
v. )  
NORTHEASTERN UNIVERSITY, )  
Defendant. )  
\_\_\_\_\_  
MANISHA Bahrani and DUNCAN  
LEGGET, individually and on behalf of  
all others similarly situated, ) Case No. 1:20-cv-10946-RGS  
Plaintiff, )  
v. )  
NORTHEASTERN UNIVERSITY, )  
Defendant. )

**UNOPPOSED MOTION TO EXTEND THE TIME FOR  
AMENDMENT OF PLEADINGS**

Plaintiffs Manny Chong, Thane Gallo, Manisha Bahrani and Duncan Leggett (“Plaintiffs”) in the two above-captioned actions, by and through their undersigned counsel of record, move for an extension of the deadline for amendment of the pleadings to March 22, 2021. In support of this Motion, Plaintiffs respectfully submit the following:

1. This Court’s December 30, 2020 Scheduling Order in the above-captioned *Bahrani* action [ECF No. 63] provided that “All amendments to the pleadings and/or joinder of additional parties shall be completed by 3/8/21,” and the Court’s December 14, 2020 Scheduling Order in the above-captioned *Chong* action set the same deadline for amendments to the pleadings.

2. Plaintiffs’ counsel have worked diligently to resolve differences in case strategy and through those discussions, Plaintiffs have reached agreement on how to move the case forward. As part of that effort, Plaintiffs intend to file a consolidated amended complaint on behalf of all Plaintiffs in both cases, which will make the administration and prosecution of this litigation more efficient.

3. The process of preparing the consolidated complaint has commenced, but Plaintiffs need this short two-week extension in order to complete it. The additional time is needed due to the process of consolidating two different complaints with somewhat different approaches and theories, obtaining final approval for the complaint from several counsel in the two separately filed and differently plead cases, and obtaining approval from the four plaintiffs, with an opportunity for each to review the amended pleading.

4. Defendant does not oppose the relief sought by this Motion so long as Plaintiffs take the position that the filing of Plaintiffs’ intended consolidated complaint has no effect on the

merits or the timing of the decision of Northeastern's pending motion for summary judgment.

Plaintiffs agree to take such a position and thus this Motion is unopposed.

WHEREFORE, Plaintiffs respectfully request an extension of the deadline for amendment of the pleadings through and including March 22, 2021.

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)**

Undersigned counsel certify that they have conferred with counsel for Defendant in a good faith effort to resolve or narrow the issues raised by this Motion with the following result: Defendant does not oppose this motion so long as Plaintiffs take the position that the filing of Plaintiffs' intended consolidated complaint has no effect on the merits or the timing of the decision of Northeastern's pending motion for summary judgment. Plaintiffs agree to take such a position and thus this Motion is unopposed.

Dated: March 8, 2021

Respectfully submitted,

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Thane Gallo*

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 8, 2021.

/s/ David Pastor

David Pastor